

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

x

ANDREW RODRIGUEZ, in his individual capacity and on behalf of others similarly situated,

Case No.: 19-cv-07052 (PKC) (RML)

Plaintiff,

- against -

NATIONAL GOLF LINKS OF AMERICA and
WILLIAM MULLER,

Defendants.

OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, National Golf Links of America and William Muller (together the “Defendants”) hereby offer to allow judgment to be taken against them by Nicholas Rodado (“Opt-In Plaintiff”), in the amount of Two Thousand Five Hundred Dollars (\$2,500), together with costs accrued to date.

This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure, and is not to be construed either as an admission that Defendants are liable to Opt-In Plaintiff or that Opt-In Plaintiff has suffered any damages.

Date: Uniondale, New York
May 14, 2021

Respectfully submitted,

FARRELL FRITZ, P.C.

By: *Domenique Camacho Moran*
Domenique Camacho Moran
Attorneys for Defendants
400 RXR Plaza
Uniondale, NY 11556
Telephone: (516) 227-0626
Facsimile: (516) 227-0777

and

WACHTELL, LIPTON, ROSEN & KATZ
Marc Wolinsky
Attorneys for Defendants
51 West 52nd Street
New York, NY 10019
Telephone: (212) 403-1000
Facsimile: (212) 403-2000

TO: ZABELL & COLLOTTA, P.C.
Saul D. Zabell
Attorneys for Opt-In Plaintiff
One Corporate Drive
Suite 103
Bohemia, NY 11716
Telephone: (631) 589-7242
Fax: (631) 563-7475

X Marc Wolinsky

I accept this offer.